

May 7, 2012

Comments from Germany on Tonga's Strategic Programme for Climate Resilience

General Comments

We would like to congratulate the Government of the Kingdom of Tonga for designing and presenting a well-written SPCR document.

Overall, the SPCR document is structured clearly and the proposed investment projects seem appropriate. From our point of view there are no major objections. We would, however, like to make a number of suggestions and recommendations (see **bold** highlights below), for project design and during implementation of the SPCR.

It should be noted that about 80% of the budget of the *Ministry of Environment and Climate Change* (MECC) is project-funded. The implementation of national climate change plans is carried out almost entirely by projects. This implies an urgent need for institutional capacity development in Tonga, to which we expect the SPCR to make an important contribution.

As would be expected given the comparatively small size of Tonga's administration on the one hand, and the magnitude of the problems caused by climate change on the other, there are considerable overlaps between the SPCR's components and other initiatives and projects. Therefore, an **effective coordinating and monitoring mechanism is needed**. We recommend that **such a mechanism should preferably be institutionalised** to ensure sustainability, and not set up as part of the *JNAP Secretariat*, as the JNAP Secretariat depends on project funds.

To strengthen the capacities of Fiji, Tonga, Vanuatu and other Pacific islands to better cope with the predicted effects of climate change, the *Secretariat of the Pacific Community* (SPC) in cooperation with Germany started a regional programme in January 2009. The programme is funded by the German *Federal Ministry for Economic Cooperation and Development* (BMZ) and implemented by GIZ. Since 2011, the programme is called *Coping with Climate Change in the Pacific Island Region* (SPC/GIZ CCCPIR), operating with an increased budget of 17.2 million € in 12 countries. This makes the programme an even stronger partner for implementation of the SPCR

We are somewhat concerned that there is hardly any reference to supporting the implementation of national sectoral policies and plans. Alignment with the objectives of these policies and plans would be an important element of mainstreaming and institutionalisation. **We therefore recommend that the SPCR should explicitly mention those relevant sectoral policies and plans that it will support as part of its mainstreaming and institutionalisation efforts.** Note for instance that the *National Forest Policy* has included climate change issues.

Comments on Individual Components / Projects / Measures

Component 1 – Capacity Building to Support Transformation to a Climate Resilient Development Path

Paragraph 203, page 158, (d): We recommend considering the implications of MECC having hardly any permanent staff. Before this background, the fund allocation for the

PMU and the JNAP secretariat may be oversized and carry considerable risk for their institutional continuity, as much work will be done with non-permanent staff. To address these issues, the SPCR should instead consider strengthening the capacity building within Component 1 for *other* government sector officers (in CCA and DRR). To some extent, this problem has already been mentioned in the paragraph (205) on risks for Component 1.

Paragraph 203, page 159, (e): **We recommend clarifying the following questions:** Will these activities (community-level climate change vulnerability mapping and adaptation planning and disaster risk management) be undertaken in collaboration with the *Lands Department / Ministry of Lands*? Where will the *Geographic Information System (GIS)* Section central database be hosted and who will be carrying out future monitoring? This needs to be elaborated as this determines the sustainability of the activity.

Component 2 – Sustainable Climate Change Financing

Paragraph 211, page 164: We wonder whether small grants can really cover infrastructure initiatives such as wharves (as stated in the budget). **We therefore recommend describing in greater detail how small grants would cover infrastructure initiatives such as wharves.**

Component 3 – Building Ecosystem Resilience and Climate Proofing Critical Infrastructure (including Coastal Protection Systems)

Given Component 3 with its large infrastructure activities, it **may be worth discussing how the project would learn from past experiences especially with infrastructure projects (such as irrigation systems) that were not maintained or not sustainable.**

Furthermore the component could be somewhat more detailed on the “ecosystem” elements of “building ecosystem resilience”. For instance, the work on the island of ‘Eua is mentioned in the context of sustainable land management (erosion control). However, ‘Eua hosts a large watershed and the country’s only forest national park, so the component could play a stronger role in the implementation of the watershed management plan and in maintaining the forest ecosystem. Before this background, **we recommend focussing more on the environment as a whole and on the outcome relating to resilience building of the whole ecosystem instead of selected sectors (such as fisheries/agriculture/protected areas) only.**

Page 169, paragraph 217: The document mentions under *Risks* that “*restructuring the physical planning process in Tonga to incorporate climate change considerations is a challenge that can only be initiated under the SPCR, and but will rely largely on capacity building support under the GEF-funded Sustainable Land Management (SLM) project*”. We would like to note that to our knowledge the UNDP/GEF *Sustainable Land Management Project* was supposed to have wrapped up by the end of March 2012, and **recommend verification of whether support by the UNDP/GEF project will continue to be provided.**

Page 169, table, budget item # 2: We are not clear as to whether an *integrated coastal and water resource management plan* would be developed for all islands, or for the island of Tongatapu only. **We recommend specifying the coverage of integrated coastal and water resource management plans more clearly, as it has budgetary implications.**

Miscellaneous Comments

(Comments made in order of appearance in the SPCR document.)

Paragraph 15: The *Tonga Second National Communication* is in final *draft* form and was to be presented to cabinet early this year for endorsement. **We recommend verifying its status, which can be checked with the MECC CEO.**

Paragraph 20: “Most of the traditional root crops in Tonga, such as cassava, taro, and yams, have been disastrously affected due to their sensitivity to dry weather.” This is a generalisation. Some traditional crops cope well under drought conditions. **We recommend changing to “some traditional crop varieties” instead of “most”.**

Paragraph 29: We suggest considering that the *Tonga National Climate Change Adaptation Strategy for Land-based Resources* is currently being finalised.

Synergies with German Climate Change Related Engagement in the Country / Region

We recommend establishing strong links and proactively exploring synergies between the SPC/GIZ CCCPIR activities and the activities being planned under the SPCR.

The SPCR implementation could also benefit from best practices established through German support of the *Indonesia Climate Change Trust Fund (ICCTF)*. GIZ and KfW Development Bank have advised the Indonesian *Ministry of National Development Planning* and the *Ministry of Finance* from initially establishing the fund all the way to its implementation phase. Main fields of activity were establishing the legal basis of a nationally-managed trust fund, the standard operating procedures, and the inclusion in the policy framework for climate change. GIZ and KfW also support the establishment of a technical counselling centre for project applicants and a fund tranche for the private sector.